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Attorneys for Defendant, **BRANT BLAKEMAN**

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

CORY SPENCER, an individual;  
DIANA MILENA REED, an individual;  
and COASTAL PROTECTION  
RANGERS, INC., a California non-profit  
public benefit corporation,

Plaintiffs,

v.

LUNADA BAY BOYS; THE  
INDIVIDUAL MEMBERS OF THE  
LUNADA BAY BOYS, including but  
not limited to SANG LEE, BRANT  
BLAKEMAN, ALAN JOHNSTON  
AKA JALIAN JOHNSTON, MICHAEL  
RAE PAPAYANS, ANGELO  
FERRARA, FRANK FERRARA,  
CHARLIE FERRARA, and NICOLAS  
FERRARA; CITY OF PALOS  
VERDES ESTATES; CHIEF OF  
POLICE JEFF KEPLEY, in his  
representative capacity; and DOES 1-10,

Defendants.

**Case No.: 2:16-CV-2129-SJO-RAO**

Assigned to Courtroom: 10C  
The Honorable S. James Otero

Magistrate Judge:  
Hon. Rozella A. Oliver

**NOTICE OF ERRATA RE EXHIBIT  
B TO DOCKET NUMBER 200  
DEFENDANT BLAKEMAN'S JOINT  
REPORT TO MAGISTRATE**

**Discovery Cut-Off**

**Date: 8/7/17**

**Pretrial Conf. Date: 10/23/17**

**Trial Date: 11/7/17**

**NOTICE OF ERRATA RE EXHIBIT B TO DEFENDANT BLAKEMAN'S  
JOINT REPORT TO MAGISTRATE**

1 TO THE COURT AND TO ALL PARTIES: PLEASE TAKE NOTICE that  
2  
3 Exhibit B as attached to Docket number 200 was incomplete. A complete copy of  
4 the Exhibit is attached hereto.

5 DATED: January 18, 2017

6 By: **VEATCH CARLSON, LLP**  
7 ROBERT T. MACKEY  
8 RICHARD P. DIEFFENBACH  
9 JOHN P. WORGUL  
10 Attorneys for BRANT BLAKEMAN  
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## **EXHIBIT B**

**Richard P. Dieffenbach**

**From:** Richard P. Dieffenbach  
**Sent:** Wednesday, January 04, 2017 6:19 PM  
**To:** 'Victor Otten'  
**Cc:** 'rcooper@buchalter.com'; Rob Mackey; John E. Stobart; John Worgul  
**Subject:** 3005978020-1-3-3 Spencer v Lunada Meet and confer of January 4  
 Mr. Otten

This email is sent following our meeting this morning relating to Mr. Blakeman's discovery to plaintiffs and our motion to compel further responses.

We discussed the three issues raised by the order:

1. Any developments or progress regarding the discovery disputes since the filing of the motion;
2. Which disputes, if any, were resolved at the conference; and
3. For any remaining disputes, how each party proposed to resolve the dispute at the conference.

Taking these in order, it was agreed between counsel for plaintiffs and for Mr. Blakeman:

1. Since the motion was filed we met and conferred January 4 in my office. Plaintiffs' Motion for Class certification was filed December 29, and a motion by Plaintiffs to compel discovery from Mr. Blakeman was in the process of being filed January 4. These events resulted in an agreement by Plaintiffs to provide, within seven days (i.e., received in our office by close of business January 10, 2017) further answers to the pending discovery from Blakeman, not waiving their objections, but providing factual information in response to the discovery "in conformance" with the declarations and other information contained in Plaintiff's recent filings and declarations.
2. The main dispute which was at least potentially resolved at the meeting today was that Plaintiffs agreed to provide factual information in response to the discovery. Defendant's counsel agreed to review the updated responses and then decide after consideration of the updated responses whether further hearing is needed.
3. Plaintiffs did not agree the interrogatories were proper and still contend that the interrogatories were premature contention interrogatories; Mr. Blakeman's counsel did not agree that the interrogatories are premature or improper in form. Nevertheless, to try to resolve the dispute the parties agreed that once Plaintiffs' responses are revised they will be reviewed and Mr. Blakeman's counsel will then notify Plaintiffs' counsel and the court whether further hearing is required.

Per the Magistrate Judge's order a joint report setting for the above will be prepared. The foregoing is suggested without prejudice to amendment or revision. Should you wish to revise the above or add to it or state it differently please provide a proposed response/replacement/plaintiffs' version and we can either incorporate the two as a single statement or present a Plaintiffs' and a defendant's version for the court if necessary.



Thank you for meeting us this morning. If there are any questions please call or email.

Richard P. Dieffenbach, Esq.

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**Richard P. Dieffenbach**

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**From:** Richard P. Dieffenbach  
**Sent:** Thursday, January 12, 2017 6:51 PM  
**To:** 'Victor Otten'  
**Cc:** Robert Cooper; Rob Mackey; John Worgul; John E. Stobart  
**Subject:** Joint Statement for Discovery motion  
**Attachments:** PLD-joint report re magistrates minute order re Blakeman's mtc.doc  
Mr. Otten

Attached is the Defendant's portion of the Joint Statement relating to Mr. Blakeman's Motion to Compel. Please provide Plaintiffs' portion and any supplemental memorandum and return it to me tomorrow so we can file it with the court in keeping with the time requirements. Thank you.

Richard P. Dieffenbach, Esq.

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